

Exhibit A  
Brief of LP

## Louisiana-Pacific Corporation

#1 L-P Drive/P O Box 158  
Samoa (Humboldt County) California 95564  
Telephone (707)443-7511

May 25, 1999

Tel Conu 24 June 1999  
w/ Jim Grassano  
Not Recd 4/26(-) But Response  
→ FAX via  
John Coch  
24 June

Mr Jim Grassano  
Alabama Department of  
Environmental Management  
1400 Coliseum Blvd  
Montgomery, AL 36110

### RE: Louisiana-Pacific Corporation Lockhart, Alabama

Dear Mr Grassano

As you know, Louisiana-Pacific Corporation (L-P) has shut down it's facility located on Highway 55, Lockhart, Covington County, Alabama. Day to day responsibility for the site now lies with L-P Real Estate Department. The Real Estate Department will be selling equipment at the site and preparing the site for permanent closure.

Per your discussion with John Harrie on May 14, 1999, L-P is beginning the process of closing the CCA Wood Treatment facility located on the site. The facility is comprised of 5-six feet diameter wood treatment cylinders, 5 steel product storage tanks, and an approximately 17,300 square feet drip pad. The tanks, product stored in the tanks and two functional cylinders are being sold to another wood treatment facility.

L-P is in the process of preparing a Closure Plan (CP) in general accordance with the Alabama Department of Environmental Management (ADEM) Chapter 335-14-5 Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities (TSD). We recognize that as a small quantity generator, L-P is not required to submit a formal CP. However, to effectively close the facility, general consensus of the closure sequence by ADEM and L-P is desirable.

At this time, L-P would like to proceed with the sale of the equipment and product at the site. Approximately 700 gallons of CCA 50% concentrate, 17,600 gallons of CCA 2% working solution, and 22,000 gallons of effluent water will be transported. Prior to transport, the cylinders, piping and tanks will be washed with a pressure washer to remove dust. The system will be dismantled and placed on

Mr. Jim Grassiano

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trucks for transport. The product and equipment will be weighed and shipped under a bill of lading. Wash water will be collected and disposed of appropriately.

Following removal of this equipment, we would like to schedule an on-site meeting with ADEM to discuss the specific details of the CP. Based on this meeting, L-P will compile the CP to be submitted for ADEM's review and approval. Upon implementation of the CP activities, a Closure Report documenting the details of the closure will be prepared for your review.

As a separate matter, L-P intends to perform maintenance activities on the remediation system at the site either during the week of June 7, 1999, or during the week of June 14, 1999 (dependant on scheduling). The system will be shut off during the maintenance period. Down times will be recorded on the on-site log. Liquid levels will be measured in select wells during the shut-down and start-up periods.

L-P requests a written response to this letter in order to clearly document the sequence of events concerning closure of this site. Should you have any questions or comments please contact Mr. John Harrie at (505) 286-8047, or myself at (707) 269-7502.

Sincerely,



Neil Sherman  
Environmental Manager

Cc Lauri Newton, L-P Portland  
Chris Paulson L-P Hayden Lake  
John Harrie

**ADEM**

JKC


**ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

 Post Office Box 301463 • 1400 COLISEUM BL D 36111-2059  
 MONTGOMERY, ALABAMA 36130-1453

**JAMES W. WARR**  
 DIRECTOR

July 26, 1999

 WWW.ADEM.STATE.AL.US  
 (334) 271-7700

**DON SIEGELMAN**  
 GOVERNOR

**CERTIFIED MAIL # Z 385 766 615**  
**RETURN RECEIPT REQUESTED**

 Mr. Neil Sherman  
 Environmental Manager  
 Louisiana-Pacific Corporation  
 P O Box 726  
 Evergreen, AL 36401

 Facsimiles (334)  
 Administration 271-7950  
 Air 279-3044  
 Land 279-3050  
 Water 279-3051  
 Groundwater 270-5631  
 Field Operations 272-8131  
 Laboratory 277-6716

Re    **Review of General Sequence of Events for Closure of Wood Treatment Facility in  
 Lockhart, Alabama**  
 Louisiana-Pacific Corporation  
 Lockhart, Covington County, Alabama  
 USEPA I.D. No ALD 095 687 786

Dear Mr. Sherman

The Alabama Department of Environmental Management (ADEM) has completed its review of Louisiana-Pacific's (LP's) letter dated May 25, 1999. LP has presented its proposed sequence of events for proceeding with closure of the Lockhart facility. This letter, as requested, presents ADEM's written response regarding the Department's review of LP's proposal. In particular, LP would like ADEM's consensus with the overall sequence of events outlined in its May 25, 1999 letter prior to proceeding with the sale of equipment and development of the formal closure plan.

LP's treatment facility consists of five-6 ft diameter wood treatment cylinders, five steel product storage tanks, and a drip pad of 17,300 sq ft. LP intends to sell five steel tanks, the product stored in tanks, and two of the functional cylinders to another wood treatment facility. Approximately 700 gallons of CCA 50% concentrate, 17,600 gallons of CCA 2% working solution; and 22,000 gallons of effluent water will be transported off site.

LP is in the process of preparing a closure plan to address the drip pad as part of the overall site closure. LP has stated in its May 25, 1999 letter that it is a small quantity generator and is thus not required to submit a formal closure plan. While the facility is a small quantity generator it is also a permitted Treatment, Storage, and Disposal (TSD) facility and as such is bound by the conditions of LP's Post-Closure permit. Under the permit (which is up for renewal in December 2000), the treatment facility consists of several Solid Waste Management Units (SWMUs). (For example, the drip pad, several sumps, tanks, and satellite waste accumulation areas are all individual SWMUs.) Because of this designation, closure of the facility may affect the status of certain SWMUs and the Department can impose requirements to investigate the status of the SWMUs under the permit.

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In summary, the Post-Closure permit requires that LP complete all ongoing investigation activities under the permit and that all remaining contamination issues be properly resolved for the SWMUs in question under the continuing RFI process. In addition, as a result of the closure of the drip pad it and CCA treatment process, it is apparent to the Department that a formal interim measures (IM) workplan meeting the requirements of Section III.E of the Post Closure Permit is required at this time. The IM Workplan will essentially address closure issues related to the drip pad and related SWMUs and should also meet the performance based closure requirements of ADEM Administrative Code 335-14-5-23 (6).

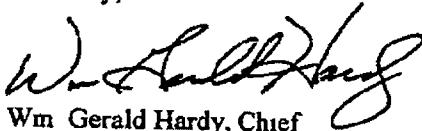
Regarding the sale of equipment, the product solutions and effluent water will reportedly be weighed and shipped under a bill of lading to the purchaser. Prior to transport, the cylinders, piping, and tanks will be pressure washed with a medium pressure, low volume washer to remove dust. LP will then dismantle the system and place it on trucks for transport to the purchaser. LP states that wash water will be collected and disposed of in accordance with all applicable ADEM regulations. Likewise, ADEM requires that any sludge or solid residuals be removed and properly disposed prior to transport.

LP's proposed schedule implies that a time extension is requested to complete RFI activities. While the Department does not necessarily approve of the time extension, it is understood that we will meet shortly to discuss these matters and at that time, LP will present a schedule to bring all activities back on track.

In conclusion, ADEM concurs with the proposed sequence of events, as reiterated for clarification purposes, by this letter. Also, ADEM can meet with LP at the site to discuss LP's forthcoming remediation plan in greater detail, as requested. Tentatively, ADEM is scheduled to meet with LP on August 3, 1999 in Lockhart to review site conditions and discuss LP's proposed approach for conducting the RFI and interim measures (i.e., closure) investigations.

If you have any questions regarding this matter, please call Jim Grassiano at 334-270-5628.

Sincerely,



Wm. Gerald Hardy, Chief  
Land Division

WGH/JWG/sem:L.LF7-23-99

cc ✓ Ms. Lauri Newton/LP, Portland  
John Harrie/LP  
Bob Barr/ADEM  
Wes Hardegree/EPA Region 4

File. LP, Covington/Haz Waste/Correspondence